

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

OSCAR SANCHEZ, MARCUS WHITE,
TESMOND MCDONALD, MARCELO
PEREZ, ROGER MORRISON, KEITH
BAKER, PAUL WRIGHT, TERRY
MCNICKELS, JOSE MUNOZ, KIARA
YARBOROUGH, OLIVIA WASHINGTON,
and IDEARE BAILEY, *on their own and on
behalf of a class of similarly situated persons,*

Petitioners/Plaintiffs,

v.

DALLAS COUNTY SHERIFF MARIAN
BROWN, *in her official capacity*, and
DALLAS COUNTY, TEXAS,

Respondents/Defendants.

Civil Action No. 20-cv-832

PLAINTIFFS' RULE 37 MOTION TO COMPEL PRODUCTION OF DOCUMENTS

Pursuant to Federal Rule of Civil Procedure 37, Plaintiffs, through their undersigned counsel, respectfully move this Court for an order compelling Defendants Dallas County Sheriff Marian Brown and Dallas County, Texas ("Defendants"), to produce COVID-related grievances by Detainees of the Dallas County Jail submitted to Defendants Sheriff Marian Brown and Dallas County, Texas, in addition to Defendants' responses thereto.

Plaintiffs also move this Court to require Defendants to file an expedited response brief, given the short time period for fact discovery in this case.

For the reasons stated in the Plaintiffs' Memorandum in Support of the instant Motion to

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Compel Production of Documents, Plaintiffs respectfully request that the Court grant the Motion.

Dated: December 8, 2020

Respectfully submitted,

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CERTIFICATE OF CONFERENCE

As set forth in the Memorandum of Law and Declaration of Adam Safwat in Support of Plaintiffs' Motion to Compel, the parties met and conferred by telephone and through correspondence, but have reached an impasse on the subject of the Motion.

/s/Adam Safwat

Adam Safwat

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served via the Court's CM/ECF system on all counsel registered with that system, and via email, on December 8, 2020.

/s/Adam Safwat

Adam Safwat